

The purpose of the ARRL petition is to request the FCC comes into compliance with WRC-2003 and eliminate the requirement for Morse Code (CW). While a good first step, I believe the petition falls short for the following reasons:

- 1) It does not eliminate the code for all license classes.
- 2) It fails to differentiate between different modes power levels
- 3) It does not address allocation of frequencies to CW and digital modes
- 4) It does nothing to insure that privileges are granted according to competency
- 5) It does nothing to insure that operators become current with the latest regulations and operating practices

All these shortcomings will eventually prove to be an enforcement nightmare. We have seen this happen in the Citizen's Band, MURS and GMRS. It would be tragic if it happened to the Amateur Radio Service and Amateur Satellite Service.

I urge the commission to consider the following changes to the ARRL proposal:

- a) Eliminate the code for all license classes
- b) Structure three levels of competency testing for Novice, General and Extra.
 1. Improve the question pools in regards to questions about band plans
 2. Improve the question pools in regards to RFI and harmful emissions
 3. Improve the question pools in regards to power restrictions
 4. Insure Novice class question pool contains topics about enforcement, fines and license revocation for violating privileges
- c) Reduce CW and FSK bandwidth to the following frequencies:
 - 3.50 to 3.60 MHz
 - 7.00 to 7.05 MHz
 - 10.100 to 10.125 MHz
 - 14.00 to 14.05 MHz
 - 18.068 to 18.100 MHz
 - 21.00 to 21.10 MHz
 - 24.89 to 24.900 MHz
 - 28.00 to 28.100 MHz
 - 222.00 to 222.10 MHz
 - 1298.0-1300.0 MHz
- d) Structure HF phone privileges in the following way:
 1. 1.800 - 2.00 Extra and General
 2. 1.975 - 2.00 Novice, 100W limitation
 3. 3.600 - 4.000 Extra
 4. 3.700 - 4.000 General
 5. 3.900 - 4.000 Novice, 100W limitation
 6. 7.050 -7.300 Extra
 7. 7.100 -7.300 General
 8. 7.250 - 7.300 Novice
 9. 10.125 - 10.150 Extra and General (200W limitation)
 10. 14.050 - 14.350 Extra
 11. 14.100 - 14.350 General
 12. 14.300 -14.350 Novice, 100 W limitation
 13. 18.100 -18.168 Extra and General
 14. 21.100 - 21.450 Extra
 15. 21.200 - 21.450 General
 16. 21.400 - 21.450 Novice, 100W limitation
 17. 24.900 - 24.990 Extra and General

- 18. 24.980 - 24.990 Novice, 100W limitation
- 19. 28.100 - 29.700 Extra and General
- 20. 29.550 - 29.700 Novice, 100W SSB, 50W FM Limitations

- e) Restrict Novice class operator phone privileges to 50 watts FM above 50 MHz.
- f) Restrict spread spectrum and digital voice operations to Extra Class operators
- g) Restrict Novice and General license duration to 5 years, Extra to 10 years
- h) Require all operators to be retested before license renewal